

EXHIBIT "6"

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17 Attorneys for Plaintiffs CORY
SPENCER, DIANA MILENA REED,
18 and COASTAL PROTECTION
RANGERS, INC.
19

20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
22

23 CORY SPENCER, an individual;
24 DIANA MILENA REED, an
individual; and COASTAL
25 PROTECTION RANGERS, INC., a
26 California non-profit public benefit
corporation,
27

28 Plaintiffs.

CASE NO. 2:16-cv-02129-SJO (RAOx)

**PLAINTIFF CORY SPENCER'S
FURTHER SUPPLEMENTAL
RESPONSE TO REQUEST FOR
PRODUCTION OF DOCUMENTS,
SET ONE, PROPOUNDED BY
DEFENDANT BRANT BLAKEMAN**

v.

LUNADA BAY BOYS; THE
INDIVIDUAL MEMBERS OF THE
LUNADA BAY BOYS, including,
but not limited to, SANG LEE,
BRANT BLAKEMAN, ALAN
JOHNSTON AKA JALIAN
JOHNSTON, MICHAEL RAE
PAPAYANS, ANGELO FERRARA,
FRANK FERRARA, CHARLIE
FERRARA, and N. F.; CITY OF
PALOS VERDES ESTATES;
CHIEF OF POLICE JEFF
KEPLEY, in his representative
capacity; and DOES 1-10,

Defendants.

PROPOUNDING PARTY: Defendant BRANT BLAKEMAN

RESPONDING PARTY: Plaintiff CORY SPENCER

SET NO.: One

Pursuant to Federal Rule of Civil Procedure 34, Plaintiff CORY
SPENCER ("Responding Party") submits these supplemental responses and
objections to Request for Production, Set One, propounded by Defendant
BRANT BLAKEMAN ("Propounding Party").

PRELIMINARY STATEMENT

Nothing in this response should be construed as an admission by
Responding Party with respect to the admissibility or relevance of any fact or
document, or of the truth or accuracy of any characterization or statement of
any kind contained in Propounding Party's Request for Production.
Responding Party has not completed its investigation of the facts relating to
this case, its discovery or its preparation for trial. All responses and

1 objections contained herein are based only upon such information and such
2 documents that are presently available to and specifically known by
3 Responding Party. It is anticipated that further discovery, independent
4 investigation, legal research and analysis will supply additional facts and add
5 meaning to known facts, as well as establish entirely new factual
6 conclusions and legal contentions, all of which may lead to substantial
7 additions to, changes in and variations from the responses set forth herein.
8 The following objections and responses are made without prejudice to
9 Responding Party's right to produce at trial, or otherwise, evidence
10 regarding any subsequently discovered documents. Responding Party
11 accordingly reserves the right to modify and amend any and all responses
12 herein as research is completed and contentions are made.

13 **RESPONSES TO REQUEST FOR PRODUCTION**

14 **REQUEST FOR PRODUCTION NO. 1:**

15 Any and all DOCUMENTS that support your contention that any [sic]
16 BRANT BLAKEMAN participated in any way in the "commission of
17 enumerated 'predicate crimes'" as alleged in paragraph 5 of the Complaint.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

19 Responding Party objects to this request for production as premature.
20 Because this request for production necessarily relies upon a contention,
21 and because this matter is in its early stages and pretrial discovery has only
22 just begun, Responding Party is unable to provide a complete response at
23 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
24 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
25 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
26 at *1-2.

27 Responding Party further objects to this request on the grounds that it
28 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to "describe

1 with reasonable particularity each item or category of items to be inspected.”
2 Propounding Party’s request for production does not describe an item or
3 category of items with reasonable particularity.

4 Responding Party further objects to the extent that this request for
5 production invades attorney-client privilege and/or violates the work product
6 doctrine by compelling Responding Party to disclose privileged
7 communications and/or litigation strategy. Responding Party will not provide
8 any such information.

9 Responding Party believes that the information requested is
10 documented in photos, videos, text messages and emails some of which
11 have been destroyed or are being withheld by the Defendants in this case.

12 Subject to and without waiver of the foregoing objections, Responding
13 Party responds as follows:

14 Responding Party will produce all responsive documents within its
15 possession, custody, or control.

16 Phone Records:

17 Phone records produced by defendant Alan Johnston.

18 Email:

19 Records produced by defendant Sang Lee.

20 Police Reports:

21 PLTF0001-000316. (previously produced)

22 Palos Verdes Estates Police Department, Officer Report for Incident
23 16-0136, dated 1/29/16. CITY216-232. (previously produced)

24 Palos Verdes Estates Police Department, Officer Report for Incident
25 16-02164, dated 2/13/16. CITY 276-284; CITY2061-2086. (previously
26 produced)

27 Palos Verdes Estates Police Department, Officer Report for Incident
28 DR # 17-00587. (Plaintiffs are not in possession, custody or control)

1 Videos:

2 Video of Defendants Blakeman and Johnston harassing Dianna Reed.
3 DFT.BB.00081-84.

4 Defendant Sang Lee and other Bay Boys caught on video.

5 [https://www.theguardian.com/travel/video/2015/may/18/california-surf-](https://www.theguardian.com/travel/video/2015/may/18/california-surf-wars-lunada-bay-localism-video)
6 [wars-lunada-bay-localism-video](https://www.theguardian.com/travel/video/2015/may/18/california-surf-wars-lunada-bay-localism-video). PLTF2054

7 Video of David Melo harassing Diana Milena Reed and Jordan Wright
8 and attempting to block their access to public beach taken on 1/29/16.
9 PLT001867.

10 Video of Lunada Bay locals harassing suffers at the 2014 MLK event.
11 PLTF00210.

12 Video of Cassidy Beukema and Devon Demaria harassing suffers at
13 the 2017 MLK event. PLTF00213.

14 Video of Cassidy Beukema and Devon Demaria harassing suffers at
15 the 2017 MLK event. PLTF00214.

16 Peter McCollum assaults Jeff Hagins, John Hagins, Vietnam combat
17 vet Mike Bernard and his son for surfing the public beach telling them,
18 among other things, "you won't come back here again boy".

19 <https://www.youtube.com/watch?v=J1Ms0ktOaZs>

20 Defendant Michael Papayans - blocking access to the public beach:
21 <https://vimeo.com/88394493>

22 Camplin Memorial Video parts 1-3 believed to be filmed by Mark
23 Griep. PLT002030-32.

24 Video of Hank Harper. PLTF00226

25 Video of Joshua Bernstein harassing Ken Claypool. PLTF2010.

26 Video of Zach Stafford intimidating Ken Claypool. PLTF00228.

27 Video of Lunada Locals. PLTF00211.

28 Photos:

1 PLTF00230, PLTF00235, PLTF00235, PLTF00242, PLTF00249,
2 PLTF00250.

3 **REQUEST FOR PRODUCTION NO. 2:**

4 Any and all DOCUMENTS that support your contention in paragraph 7
5 of the Complaint that BRANT BLAKEMAN “is responsible in some manner
6 for the Bane Act violations and public nuisance described in the Complaint.”

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

8 Responding Party objects to this request for production as premature.
9 Because this request for production necessarily relies upon a contention,
10 and because this matter is in its early stages and pretrial discovery has only
11 just begun, Responding Party is unable to provide a complete response at
12 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
13 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
14 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
15 at *1-2.

16 Responding Party further objects to this request on the grounds that it
17 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to “describe
18 with reasonable particularity each item or category of items to be inspected.”
19 Propounding Party’s request for production does not describe an item or
20 category of items with reasonable particularity.

21 Responding Party further objects to the extent that this request for
22 production invades attorney-client privilege and/or violates the work product
23 doctrine by compelling Responding Party to disclose privileged
24 communications and/or litigation strategy. Responding Party will not provide
25 any such information.

26 Responding Party believes that the information requested is
27 documented in photos, videos, text messages and emails some of which
28 have been destroyed or are being withheld by the Defendants in this case.

1 Subject to and without waiver of the foregoing objections, Responding
2 Party responds as follows:

3 Responding Party will produce all responsive documents within its
4 possession, custody, or control.

5 Phone Records:

6 Phone records produced by defendant Alan Johnston.

7 Email:

8 Records produced by defendant Sang Lee.

9 Police Reports:

10 PLTF0001-000316. (previously produced)

11 Palos Verdes Estates Police Department, Officer Report for Incident
12 16-0136, dated 1/29/16. CITY216-232. (previously produced)

13 Palos Verdes Estates Police Department, Officer Report for Incident
14 16-02164, dated 2/13/16. CITY 276-284; CITY2061-2086. (previously
15 produced)

16 Palos Verdes Estates Police Department, Officer Report for Incident
17 DR # 17-00587. (Plaintiffs are not in possession, custody or control)

18 Videos:

19 Video of Defendants Blakeman and Johnston harassing Dianna
20 Reed. DFT.BB.00081-84.

21 Defendant Sang Lee and other Bay Boys caught on video.

22 [https://www.theguardian.com/travel/video/2015/may/18/california-surf-](https://www.theguardian.com/travel/video/2015/may/18/california-surf-wars-lunada-bay-localism-video)
23 [wars-lunada-bay-localism-video](https://www.theguardian.com/travel/video/2015/may/18/california-surf-wars-lunada-bay-localism-video). PLTF2054

24 Video of David Melo harassing Diana Milena Reed and Jordan Wright
25 and attempting to block their access to public beach taken on 1/29/16.
26 PLT001867.

27 Video of Lunada Bay locals harassing suffers at the 2014 MLK event.
28 PLTF00210.

1 Video of Cassidy Beukema and Devon Demaria harassing suffers at
2 the 2017 MLK event. PLTF00213.

3 Video of Cassidy Beukema and Devon Demaria harassing suffers at
4 the 2017 MLK event. PLTF00214.

5 Peter McCollum assaults Jeff Hagins, John Hagins, Vietnam combat
6 vet Mike Bernard and his son for surfing the public beach telling them,
7 among other things, "you won't come back here again boy".

8 <https://www.youtube.com/watch?v=J1Ms0ktOaZs>

9 Defendant Michael Papayans - blocking access to the public beach:
10 <https://vimeo.com/88394493>

11 Camplin Memorial Video parts 1-3 believed to be filmed by Mark
12 Griep. PLT002030-32.

13 Video of Hank Harper. PLTF00226

14 Video of Joshua Bernstein harassing Ken Claypool. PLTF2010.

15 Video of Zach Stafford intimidating Ken Claypool. PLTF00228.

16 Video of Lunada Locals. PLTF00211.

17 Photos:

18 PLTF00230, PLTF00235, PLTF00235, PLTF00242, PLTF00249,
19 PLTF00250, PLTF 1868.

20 **REQUEST FOR PRODUCTION NO. 3:**

21 Any and all DOCUMENTS that support your contention in paragraph
22 18 of the Complaint that BRANT BLAKEMAN "sell[s] market[s] and use[s]
23 illegal controlled substances from the Lunada Bay Bluffs and the Rock Fort."

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

25 Responding Party objects to this request for production as premature.
26 Because this request for production necessarily relies upon a contention,
27 and because this matter is in its early stages and pretrial discovery has only
28 just begun, Responding Party is unable to provide a complete response at

1 this time, nor is it required to do so. See *Kmiec v. Powerwave Techs. Inc. et*
2 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; see also *Folz v.*
3 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
4 at *1-2.

5 Responding Party further objects to this request on the grounds that it
6 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to “describe
7 with reasonable particularity each item or category of items to be inspected.”
8 Propounding Party’s request for production does not describe an item or
9 category of items with reasonable particularity.

10 Responding Party further objects to the extent that this request for
11 production invades attorney-client privilege and/or violates the work product
12 doctrine by compelling Responding Party to disclose privileged
13 communications and/or litigation strategy. Responding Party will not provide
14 any such information.

15 Responding Party believes that the information requested is
16 documented in photos, videos, text messages and emails some of which
17 have been destroyed or are being withheld by the Defendants in this case.

18 Subject to and without waiver of the foregoing objections, Responding
19 Party responds as follows:

20 Responding Party will produce all responsive documents within its
21 possession, custody, or control.

22 **REQUEST FOR PRODUCTION NO. 4:**

23 Any and all DOCUMENTS that support your contention in paragraph
24 18 of the Complaint that BRANT BLAKEMAN “impede[d] boat traffic” at any
25 time.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

27 Responding Party objects to this request for production as premature.
28 Because this request for production necessarily relies upon a contention,

1 and because this matter is in its early stages and pretrial discovery has only
2 just begun, Responding Party is unable to provide a complete response at
3 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
4 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
5 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
6 at *1-2.

7 Responding Party further objects to this request on the grounds that it
8 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to “describe
9 with reasonable particularity each item or category of items to be inspected.”
10 Propounding Party’s request for production does not describe an item or
11 category of items with reasonable particularity.

12 Responding Party further objects to the extent that this request for
13 production invades attorney-client privilege and/or violates the work product
14 doctrine by compelling Responding Party to disclose privileged
15 communications and/or litigation strategy. Responding Party will not provide
16 any such information.

17 Responding Party believes that the information requested is
18 documented in photos, videos, text messages and emails some of which
19 have been destroyed or are being withheld by the Defendants in this case.

20 Subject to and without waiver of the foregoing objections, Responding
21 Party responds as follows:

22 Responding Party will produce all responsive documents within its
23 possession, custody, or control.

24 **REQUEST FOR PRODUCTION NO. 5:**

25 Any and all DOCUMENTS that support your contention in paragraph
26 18 of the Complaint that BRANT BLAKEMAN “dangerously disregard[ed]
27 surfing rules” at any time.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

Responding Party objects to this request for production as premature. Because this request for production necessarily relies upon a contention, and because this matter is in its early stages and pretrial discovery has only just begun, Responding Party is unable to provide a complete response at this time, nor is it required to do so. See *Kmiec v. Powerwave Techs. Inc. et al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; see also *Folz v. Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014) at *1-2.

Responding Party further objects to this request on the grounds that it violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to “describe with reasonable particularity each item or category of items to be inspected.” Propounding Party’s request for production does not describe an item or category of items with reasonable particularity.

Responding Party further objects to the extent that this request for production invades attorney-client privilege and/or violates the work product doctrine by compelling Responding Party to disclose privileged communications and/or litigation strategy. Responding Party will not provide any such information.

Responding Party believes that the information requested is documented in photos, videos, text messages and emails some of which have been destroyed or are being withheld by the Defendants in this case.

Subject to and without waiver of the foregoing objections, Responding Party responds as follows:

Responding Party will produce all responsive documents within its possession, custody, or control.

Phone Records:

Phone records produced by defendant Alan Johnston.

1 Email:

2 Records produced by defendant Sang Lee.

3 Police Reports:

4 PLTF0001-000316. (previously produced)

5 Palos Verdes Estates Police Department, Officer Report for Incident
6 16-0136, dated 1/29/16. CITY216-232. (previously produced)

7 Palos Verdes Estates Police Department, Officer Report for Incident
8 16-02164, dated 2/13/16. CITY 276-284; CITY2061-2086. (previously
9 produced)

10 Palos Verdes Estates Police Department, Officer Report for Incident
11 DR # 17-00587. (Plaintiffs are not in possession, custody or control)

12 Videos:

13 Video of Defendants Blakeman and Johnston harassing Dianna Reed.
14 DFT.BB.00081-84.

15 Defendant Sang Lee and other Bay Boys caught on video.

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17 [wars-lunada-bay-localism-video](https://www.theguardian.com/travel/video/2015/may/18/california-surf-wars-lunada-bay-localism-video). PLTF2054

18 Video of David Melo harassing Diana Milena Reed and Jordan Wright
19 and attempting to block their access to public beach taken on 1/29/16.
20 PLT001867.

21 Video of Lunada Bay locals harassing suffers at the 2014 MLK event.
22 PLTF00210.

23 Video of Cassidy Beukema and Devon Demaria harassing suffers at
24 the 2017 MLK event. PLTF00213.

25 Video of Cassidy Beukema and Devon Demaria harassing suffers at
26 the 2017 MLK event. PLTF00214.

27 Peter McCollum assaults Jeff Hagins, John Hagins, Vietnam combat
28 vet Mike Bernard and his son for surfing the public beach telling them,

1 among other things, "you won't come back here again boy".

2 <https://www.youtube.com/watch?v=J1Ms0ktOaZs>

3 Defendant Michael Papayans - blocking access to the public beach:

4 <https://vimeo.com/88394493>

5 Camplin Memorial Video parts 1-3 believed to be filmed by Mark
6 Griep. PLT002030-32.

7 Video of Hank Harper. PLTF00226

8 Video of Joshua Bernstein harassing Ken Claypool. PLTF2010.

9 Video of Zach Stafford intimidating Ken Claypool. PLTF00228.

10 Video of Lunada Locals. PLTF00211.

11 Photos:

12 PLTF00230, PLTF00235, PLTF00235, PLTF00242, PLTF00249,
13 PLTF00250.

14 **REQUEST FOR PRODUCTION NO. 6:**

15 Any and all DOCUMENTS that support your contention that BRANT
16 BLAKEMAN has illegally extorted money from beachgoers who wish to use
17 Lunada Bay for recreational purposes. (See paragraph 33 j. of the
18 Complaint.)

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

20 Responding Party objects to this request for production as premature.
21 Because this request for production necessarily relies upon a contention,
22 and because this matter is in its early stages and pretrial discovery has only
23 just begun, Responding Party is unable to provide a complete response at
24 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
25 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
26 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
27 at *1-2.

28 Responding Party further objects to this request on the grounds that it

1 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to “describe
2 with reasonable particularity each item or category of items to be inspected.”
3 Propounding Party’s request for production does not describe an item or
4 category of items with reasonable particularity.

5 Responding Party further objects to the extent that this request for
6 production invades attorney-client privilege and/or violates the work product
7 doctrine by compelling Responding Party to disclose privileged
8 communications and/or litigation strategy. Responding Party will not provide
9 any such information.

10 Responding Party believes that the information requested is
11 documented in photos, videos, text messages and emails some of which
12 have been destroyed or are being withheld by the Defendants in this case.

13 Subject to and without waiver of the foregoing objections, Responding
14 Party responds as follows:

15 Responding Party has conducted a diligent search and is not presently
16 aware of any responsive documents within Responding Party's possession,
17 custody, or control. Discovery is ongoing, and this contention-based
18 interrogatory is poorly defined and premature. Thus, Responding Party
19 reserves the right to amend this response at the appropriate time in the
20 future if necessary.

21 **REQUEST FOR PRODUCTION NO. 7:**

22 Any and all DOCUMENTS that support your contention that BRANT
23 BLAKEMAN was a part of Civil Conspiracy as identified in your complaint in
24 paragraphs 51 through 53.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

26 Responding Party objects to this request for production as premature.
27 Because this request for production necessarily relies upon a contention,
28 and because this matter is in its early stages and pretrial discovery has only

1 just begun, Responding Party is unable to provide a complete response at
2 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
3 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
4 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
5 at *1-2.

6 Responding Party further objects to this request on the grounds that it
7 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to “describe
8 with reasonable particularity each item or category of items to be inspected.”
9 Propounding Party’s request for production does not describe an item or
10 category of items with reasonable particularity.

11 Responding Party further objects to the extent that this request for
12 production invades attorney-client privilege and/or violates the work product
13 doctrine by compelling Responding Party to disclose privileged
14 communications and/or litigation strategy. Responding Party will not provide
15 any such information.

16 Responding Party believes that the information requested is
17 documented in photos, videos, text messages and emails some of which
18 have been destroyed or are being withheld by the Defendants in this case.

19 Subject to and without waiver of the foregoing objections, Responding
20 Party responds as follows:

21 Responding Party will produce all responsive documents within its
22 possession, custody, or control.

23 See response to Request For Production No. 1.

24 **REQUEST FOR PRODUCTION NO. 8:**

25 Any and all DOCUMENTS that support plaintiffs’ First Cause of Action
26 in the Complaint (Bane Act Violations) against BRANT BLAKEMAN.

27 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

28 Responding Party objects to this request for production as premature.

1 Because this request for production necessarily relies upon a contention,
2 and because this matter is in its early stages and pretrial discovery has only
3 just begun, Responding Party is unable to provide a complete response at
4 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
5 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
6 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
7 at *1-2.

8 Responding Party further objects to this request on the grounds that it
9 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to “describe
10 with reasonable particularity each item or category of items to be inspected.”
11 Propounding Party’s request for production does not describe an item or
12 category of items with reasonable particularity.

13 Responding Party further objects to the extent that this request for
14 production invades attorney-client privilege and/or violates the work product
15 doctrine by compelling Responding Party to disclose privileged
16 communications and/or litigation strategy. Responding Party will not provide
17 any such information.

18 Responding Party believes that the information requested is
19 documented in photos, videos, text messages and emails some of which
20 have been destroyed or are being withheld by the Defendants in this case.

21 Responding Party further objects to this request on the grounds that it
22 is duplicative of Request No. 2.

23 Subject to and without waiver of the foregoing objections, Responding
24 Party responds as follows:

25 Responding Party will produce all responsive documents within its
26 possession, custody, or control.

27 See response to Request For Production No. 2.

28

1 **REQUEST FOR PRODUCTION NO. 9:**

2 Any and all DOCUMENTS that support plaintiffs' Second Cause of
3 Action in the Complaint (Public Nuisance) against BRANT BLAKEMAN.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

5 Responding Party objects to this request for production as premature.
6 Because this request for production necessarily relies upon a contention,
7 and because this matter is in its early stages and pretrial discovery has only
8 just begun, Responding Party is unable to provide a complete response at
9 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
10 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
11 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
12 at *1-2.

13 Responding Party further objects to this request on the grounds that it
14 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to "describe
15 with reasonable particularity each item or category of items to be inspected."
16 Propounding Party's request for production does not describe an item or
17 category of items with reasonable particularity.

18 Responding Party further objects to the extent that this request for
19 production invades attorney-client privilege and/or violates the work product
20 doctrine by compelling Responding Party to disclose privileged
21 communications and/or litigation strategy. Responding Party will not provide
22 any such information.

23 Responding Party believes that the information requested is
24 documented in photos, videos, text messages and emails some of which
25 have been destroyed or are being withheld by the Defendants in this case.

26 Subject to and without waiver of the foregoing objections, Responding
27 Party responds as follows:

28 Responding Party will produce all responsive documents within its

1 possession, custody, or control.

2 See response to Request For Production No. 1.

3 **REQUEST FOR PRODUCTION NO. 10:**

4 Any and all DOCUMENTS that support plaintiffs' Sixth Cause of Action
5 in the Complaint (Assault) against BRANT BLAKEMAN.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

7 Responding Party objects to this request for production as premature.
8 Because this request for production necessarily relies upon a contention,
9 and because this matter is in its early stages and pretrial discovery has only
10 just begun, Responding Party is unable to provide a complete response at
11 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
12 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
13 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
14 at *1-2.

15 Responding Party further objects to this request on the grounds that it
16 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to "describe
17 with reasonable particularity each item or category of items to be inspected."
18 Propounding Party's request for production does not describe an item or
19 category of items with reasonable particularity.

20 Responding Party further objects to the extent that this request for
21 production invades attorney-client privilege and/or violates the work product
22 doctrine by compelling Responding Party to disclose privileged
23 communications and/or litigation strategy. Responding Party will not provide
24 any such information.

25 Responding Party believes that the information requested is
26 documented in photos, videos, text messages and emails some of which
27 have been destroyed or are being withheld by the Defendants in this case.

28 Subject to and without waiver of the foregoing objections, Responding

1 Party responds as follows:

2 Responding Party has conducted a diligent search and is not presently
3 aware of any responsive documents within Responding Party's possession,
4 custody, or control. Discovery is ongoing, and this contention-based
5 interrogatory is poorly defined and premature. Thus, Responding Party
6 reserves the right to amend this response at the appropriate time in the
7 future if necessary.

8 See response to Request For Production No. 1.

9 **REQUEST FOR PRODUCTION NO. 11:**

10 Any and all DOCUMENTS that support plaintiffs' Seventh Cause of
11 Action in the Complaint (Battery) against BRANT BLAKEMAN.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

13 Responding Party objects to this request for production as premature.
14 Because this request for production necessarily relies upon a contention,
15 and because this matter is in its early stages and pretrial discovery has only
16 just begun, Responding Party is unable to provide a complete response at
17 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
18 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
19 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
20 at *1-2.

21 Responding Party further objects to this request on the grounds that it
22 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to "describe
23 with reasonable particularity each item or category of items to be inspected."
24 Propounding Party's request for production does not describe an item or
25 category of items with reasonable particularity.

26 Responding Party further objects to the extent that this request for
27 production invades attorney-client privilege and/or violates the work product
28 doctrine by compelling Responding Party to disclose privileged

1 communications and/or litigation strategy. Responding Party will not provide
2 any such information.

3 Responding Party believes that the information requested is
4 documented in photos, videos, text messages and emails some of which
5 have been destroyed or are being withheld by the Defendants in this case.

6 Subject to and without waiver of the foregoing objections, Responding
7 Party responds as follows:

8 Responding Party has conducted a diligent search and is not presently
9 aware of any responsive documents within Responding Party's possession,
10 custody, or control. Discovery is ongoing, and this contention-based
11 interrogatory is poorly defined and premature. Thus, Responding Party
12 reserves the right to amend this response at the appropriate time in the
13 future if necessary.

14 See response to Request For Production No. 1.

15 **REQUEST FOR PRODUCTION NO. 12:**

16 Any and all DOCUMENTS that support plaintiffs' Eighth Cause of
17 Action in the Complaint (Negligence) against BRANT BLAKEMAN.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

19 Responding Party objects to this request for production as premature.
20 Because this request for production necessarily relies upon a contention,
21 and because this matter is in its early stages and pretrial discovery has only
22 just begun, Responding Party is unable to provide a complete response at
23 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
24 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
25 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
26 at *1-2.

27 Responding Party further objects to this request on the grounds that it
28 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to "describe

1 with reasonable particularity each item or category of items to be inspected.”
2 Propounding Party’s request for production does not describe an item or
3 category of items with reasonable particularity.

4 Responding Party further objects to the extent that this request for
5 production invades attorney-client privilege and/or violates the work product
6 doctrine by compelling Responding Party to disclose privileged
7 communications and/or litigation strategy. Responding Party will not provide
8 any such information.

9 Responding Party believes that the information requested is
10 documented in photos, videos, text messages and emails some of which
11 have been destroyed or are being withheld by the Defendants in this case.

12 Subject to and without waiver of the foregoing objections, Responding
13 Party responds as follows:

14 Responding Party has conducted a diligent search and is not presently
15 aware of any responsive documents within Responding Party's possession,
16 custody, or control. Discovery is ongoing, and this contention-based
17 interrogatory is poorly defined and premature. Thus, Responding Party
18 reserves the right to amend this response at the appropriate time in the
19 future if necessary.

20 See response to Request For Production No. 1.
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DATED:

By: /s/

1 PROOF OF SERVICE

2 Spencer, et al. v. Lunada Bay Boys, et al.; USDC, Central District of
3 California, Case No. 2:16-cv-02129-SJO (RAOx)

4 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

5 At the time of service, I was over 18 years of age and not a party to this
6 action. I am employed in the County of Sacramento, State of California. My
business address is 3620 Pacific Coast Highway, Suite 100, Torrance, CA
90505.

7 On February 24, 2017, I served true copies of the following document(s)
described as:

8 PLAINTIFF COASTAL PROTECTION RANGERS, INC.'S SUPPLEMENTAL
9 RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET
ONE, PROPOUNDED BY DEFENDANT BRANT BLAKEMAN

10 on the interested parties in this action as follows:

11 SEE ATTACHED SERVICE LIST

12 BY MAIL: I enclosed the document(s) in a sealed envelope or package
13 addressed to the persons at the addresses listed in the Service List and
placed the envelope for collection and mailing, following our ordinary
14 business practices. I am readily familiar with Hanson Bridgett LLP's practice
for collecting and processing correspondence for mailing. On the same day
15 that correspondence is placed for collection and mailing, it is deposited in
the ordinary course of business with the United States Postal Service, in a
16 sealed envelope with postage fully prepaid.

17 I declare under penalty of perjury under the laws of the United States of
18 America that the foregoing is true and correct and that I am employed in the
office of a member of the bar of this Court at whose direction the service
was made.

19 Executed on February 24, 2017, at Torrance, California.

20
21 Victor Otten
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SERVICE LIST

Spencer, et al. v. Lunada Bay Boys, et al.; USDC, Central District of California, Case No. 2:16-cv-02129-SJO (RAOx)

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VERIFICATION

I, Cory Spencer, have read PLAINTIFF CORY SPENCER'S RESPONSE TO REQUEST FOR PRODUCTION, SET ONE, PROPOUNDED BY DEFENDANT BRANT BLAKEMAN and know its contents.

I am a party to this action and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 24, 2016, in TORRANCE, California.


CORY SPENCER